

November 10, 2022

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

WELL CELL GLOBAL LLC and WELL  
CELL SUPPORT LLC,

Plaintiffs,

V.

SHAWN PAUL CALVIT, MARC PIERRE  
DESGRAVES IV, CHARLES  
ALEXANDER ELLIOTT, PATRICK  
DALE LELEAUX, M.D., INSULINIC OF  
LAFAYETTE LLC, INSULINIC OF  
HIALEAH LLC, INSULINIC OF HAWAII,  
LLC, INSULINIC OF GRETN, LLC, and  
INSULINIC OF HAMMOND, LLC,

Defendants.

CIVIL ACTION NO. H-22-3062

## ORDER OF PRELIMINARY INJUNCTION

For the reasons stated in the court’s memorandum and opinion, (Docket Entry No. 76), the court grants, in part, plaintiffs’ motion for a preliminary injunction. (Docket Entry No. 4).

The court finds that a \$50,000.00 surety bond is a sufficient and proper amount of security pursuant to Federal Rule of Civil Procedure 65(c). Contingent on the plaintiffs posting this bond, it is ordered:

Defendants Shawn Paul Calvit, Marc Pierre Desgraves IV, Charles Alexander Elliot, Insulinic of Lafayette LLC, Insulinic of Hialeah LLC, Insulinic of Hawaii, LLC, and any of their assigns, agents, representatives, and any persons in active concert or participation with any of them, who receive actual notice of this order, by personal service or otherwise, are hereby restrained and enjoined from performing any of the following, or by assisting anyone else from performing the following:

1. Practicing the therapy disclosed in U.S. Patent No. 10,533,990;

2. Using any of the knowledge, information, training, or materials taught, delivered, described, or otherwise imparted from Well Cell, in whole or in part, as part of any medical procedure, treatment, therapeutic modality, or otherwise;
3. Practicing Well Cell's propriety method of insulin resensitization, the microburst insulin infusion modality, or any other form of exogenous intravenous insulin infusion designed to treat diabetes or other metabolic disorders;
4. Disclosing the plaintiffs' trade secrets, including their confidential business contacts and their specialized medical training, including their training modules, videos, and handbooks, and methods of conducting their business for Well Cell's proprietary method of insulin resensitization for the treatment of diabetes to any person or entity in the United States; and
5. Representing, by any means whatsoever, that any products manufactured, distributed, advertised, offered or sold by the defendants are Well Cell's products or vice versa, and from otherwise acting in a way likely to cause confusion, mistake, or deception on the part of purchasers or consumers as to the origin or sponsorship of such products.

Each of Shawn Paul Calvit, Marc Pierre Desgraves IV, Charles Alexander Elliot, Insulinic of Lafayette LLC, Insulinic of Hialeah LLC, Insulinic of Hawaii, LLC, and any of their assigns, agents, representatives, and any persons in active concert or participation with any of them, who receive actual notice of this order, by personal service or otherwise, are ordered to:

1. Immediately deliver to the plaintiffs any documents reflecting their specialized medical training, including their training modules, videos, and handbooks, and methods of conducting their business involving Well Cell's proprietary method of insulin resensitization for the treatment of diabetes.

SIGNED on November 10, 2022, at Houston, Texas.



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Lee H. Rosenthal  
Chief United States District Judge